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April 27, 2017

By ECF

Hon. Magistrate Judge Lois Bloom  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

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Re: *Jayanty v. St. George's University, LTD. et al.*  
Case No. 17-CV-1673-DLI-LB

Dear Judge Bloom:

We represent Defendants (1) Saint George's University Limited, incorrectly named in the Complaint as St. George's University, Ltd., SGU LTD d/b/a St. Georges University; and (2) University Support Services, LLC ("USS") (collectively "Defendants"). Pursuant to Your Honor's Individual Practice Rule 3, we write to submit this amended request for an extension of time for Defendants to answer, move, or otherwise respond to Plaintiff's Complaint to May 31, 2017. We also ask that Your Honor impose a briefing schedule should Defendants move to dismiss. Plaintiff's counsel has consented to the proposed extension and briefing schedule below. This extension is sought to allow Defendants time to evaluate a motion to dismiss and/or properly answer the Complaint. There has been no prior request for the relief sought herein.

We are informed that service of the Summons and Complaint was purportedly made on April 11, 2017 (although no affidavit of service has been filed as of yet). This would make May 2, 2017 the date by which a response to the Complaint must be filed (although we do not acknowledge that service has been properly effectuated).

As proposed herein, Defendants would answer, move or otherwise respond to Plaintiff's Complaint by May 31, 2017. Plaintiff would have until June 30, 2017 to oppose any motion to dismiss by Defendants, either individually or collectively. Defendants would have until July 14, 2017 to file their Reply.

This request is not intended as, and should not be construed as, a waiver of Defendants' right to assert any and all defenses in this matter, including but not limited to lack of personal jurisdiction, lack of service, and all other jurisdictional defenses.

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We thank the Court for its consideration of this matter.

Respectfully submitted,

\_\_\_\_ /s/ Steven D. Hurd \_\_\_\_\_

Steven D. Hurd

cc: All Counsel (via ECF)